

PRIVACY POLICY

Chelmer Footcare



Who We Are

Chelmer Footcare ('we' or 'us' or 'our') gather and process personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law. This notice provides the necessary information regarding rights and obligations, and explains how, why and when we collect and process personal data.

Chelmer Footcare (Trading name of Pod. Med Ltd) registered office is at 2 Beehive Lane, Chelmsford, Essex, CM2 9SX. Our designated Data Protection Compliance Officer for the organisation is Paul Little, and we can be contacted at email address Podmed@btconnect.com, Tel No: 01245 269069

Purpose Of This Policy

This Privacy Policy is a statement Chelmer Footcare's commitment to protect the rights and privacy of individuals. It sets out how we use and protect the information you supply when using our services. We are committed to ensuring that individuals privacy is protected. It describes how and when Chelmer Footcare collect, use, and share information when clients (Data Subjects) make/attend an appointment at the clinic, purchase a product, contact us, or otherwise use our services. This is to comply with the General Data Protection Regulations (GDPR) 2018.

Our Privacy Policy explains:

- What information we collect
- How we collect it
- How we use that information
- What information we share
- How we safeguard any data that is supplied to us

Please make sure that you have read and understood our Privacy Policy. We prioritise safeguarding all data which you provide in order for us to fulfil law regarding the keeping of medical records.

Principles of Processing Personal Data

Any staff member or associate of Chelmer Footcare who is involved in the collection, storage or processing of personal data has responsibilities under legislation:

- to obtain and process personal data fairly.
- to keep such data only for explicit and lawful purposes.
- to disclose such data only in ways compatible with these purposes

to keep such data safe and secure.
to keep such data accurate, complete and up-to-date.
to ensure that such data is adequate, relevant and not excessive.
to retain such data for no longer than is necessary for the explicit purpose.
to give, on request, a copy of the data to the individual to whom they relate, such a request is known as an Access Request

Information That We Collect

Chelmer Footcare processes personal information to meet our legal, statutory and contractual obligations and to provide our products and services. We will never collect any unnecessary personal data and do not process information in any way, other than already specified in this notice. Information collected on electronic devices are fully password protected and are only accessed by Chelmer Footcare staff. Medical notes are kept on paper format and are locked away in a staff only area within lockable filing cabinets. Paper notes are destroyed by a Certified sensitive information contractor after the statutory time required by law.

The personal data that we collect is: –

Patient name
Patient date of birth
Patient weight and shoe size
Patients prescribing clinician/hospital
Patient identifier no.
Patient medical/pathology details and treatment notes
Patient gender
Patient phone number address and Email address
Patient credit card details in some instances

We collect information in the following way: –

From medical notes produced from consultations
Patient consent forms
Over the phone when making appointments or making enquiries
From our message service on our website
Social Media
Podmed email address

How We Use Your Personal Data (Legal Basis for Processing)

Chelmer Footcare takes data privacy very seriously and will never disclose, share or sell personal data without consent, unless required to do so by law. We only retain personal data for as long as is necessary and for the purposes specified in this notice.

Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw consent at any time.

The purposes and reasons for processing your personal data are detailed below: –

We collect personal data in order to make appointments for Podiatry and Foot Healthcare services and to satisfy the legal requirement of keeping medical notes.

We collect and use a mobile phone number (only as requested by the Data Subject) to send text reminders of upcoming appointments.

We collect and store personal data as part of a relevant filing system.

We may use personal data in a generic format for the purpose of case histories for internal training purposes that may help in resolving issues in the patient medical treatment and for educational/training purposes.

Information Sharing and Disclosure

Sharing personal information is limited to few circumstances, as follows:

We may transfer personal data for appointment making purposes to our off-site reception service (Real Time Reception)

We may disclose personal information to any relevant regulator, if they require it or to anyone else if there is a legal duty to do so.

With your consent disclosing information with medical professionals such as GPs or consultant to allow continuity of care.

Chelmer Footcare engages certain trusted third parties to perform functions and provide services to its business, such as external reception services. Disclosure of personal information with these third parties, will be only to the extent necessary to perform these services.

Business transfers. If Chelmer Footcare merges its business, disclosure of information as part of that transaction may be necessary but only to the extent permitted by law and with your consent.

Data Subject Rights

Data Subjects have the right to access any personal information that Chelmer Footcare processes and to request information about: –

What personal data we hold about a data subject

The purposes of the processing

The categories of personal data concerned

The recipients to whom the personal data has/will be disclosed

How long we intend to store your personal data for

If we did not collect the data directly from the data subject, information about the source

Data Subjects rights include the right of access, rectification, erasure, restriction as well as the right to transfer of their data, the right to object to some processing and automated decision making, including profiling. These rights may be exercised freely and at no cost.

If you believe that we hold any incomplete or inaccurate personal data, the data subject has the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified. Please write to us or email us at Podmed@btconnect.com We will promptly correct any information found to be incorrect.

The data subject also has the right to request erasure of their personal data or to restrict processing in accordance with data protection laws (apart from medical notes which must remain intact for 7 years after the treatment date) as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from a data subject to exercise any of the above rights, we may ask that person to verify their identity before acting on the relevant request; this is to ensure that a data subjects data is protected and kept secure.

Data Subject Access Requests

Where a formal request is submitted by a Data Subject in relation to the data held by Chelmer Footcare, such a request gives rise to access rights in favour of the Data Subject. We will ensure that, where necessary, such requests are forwarded to the Data Protection Compliance Officer in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 30 days from receipt of the request.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of personal information without consent, other than for the purposes specified in this notice or where there is a legal requirement. Chelmer Footcare uses third-party reception (Real Time Reception) to provide out of hours reception services, however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. Information passed between Chelmer Footcare and Real Time reception includes sharing such data as: Patient name, Address, Telephone number(s) Email address and an outline of the type of appointment required.

Marketing

Any marketing to you shall be based strictly on consent to do so, obtained directly from you.

We may collect non-personally identifiable information with cookies, such as IP address, browser type and version, and pages you view on our website. You can remove cookies by following directions on your Internet browser's settings.

We use Google Analytics to track of how you got to our site and any links you click on to leave our site. Once you leave our site, we do not track you. Such aggregate information is anonymous and does not identify any individual user, and we do not link this automatically collected data to personally identifiable information.

Legal Reasons

We will share personal information with 3rd parties if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request.
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Chelmer Footcare, our users or the public, as required or permitted by law.

Safeguarding Measures

Chelmer Footcare takes data privacy seriously and we take every reasonable measure and precaution to protect and secure personal data. We work hard to protect the data subject and their information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: –

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.

Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

We restrict access to personal information solely to Chelmer Footcare employees and 3rd parties who require the information to process appointments and who are subject to strict contractual confidentiality obligations. Failure of a third party to manage Chelmer Footcare's data in a compliant manner will be viewed as a breach of contract and may be disciplined, or their contract terminated if they fail to meet these obligations. Failure of Chelmer Footcare's staff to process Personal Data in compliance with this policy may result in disciplinary proceedings.

Data Retention

The retention of personal information will be for only for as long as necessary to provide you with services and as described in this Privacy Policy. However, it may also be requirement to retain this information to comply with legal and regulatory obligations, to resolve disputes, and to enforce agreements. The retention of podiatry records is normally a minimum of 8 years, after the last appointment. For clients who are not patients but may have bought products from the business, Chelmer Footcare may keep any data you may have provided for a minimum of 6 years in line with tax legislation.

Special Categories Data

Owing to the products and services that we offer Chelmer Footcare need to request sensitive personal information in the performance of a contract to advise on best product and prescription combinations to provide medical treatment to the data subject. Where we collect sensitive personal data, we will only request the information required for the specified purpose.

Consequences of Not Providing Personal Data

A data subject is not obligated to provide personal information to Chelmer Footcare, however, as this information is required by law for us to provide our services, we will not be able to offer our products or services without it.

Breach Notification

It is Chelmer Footcare's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be notified within 72 hours. This will be managed in accordance with our Information Security Incident Response Procedure which sets out the overall process of handling information security incidents.

Addressing compliance to GDPR

The following actions are undertaken to ensure that Chelmer Footcare complies at all times with the accountability principle of GDPR:

The legal basis for processing information is clear and unambiguous

All staff involved in handling personal data understand their responsibilities for following good data protection practise.

Training in data protection has been provided to all staff

Rules regarding consent are followed.

Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively

Regular reviews of procedures involving personal data are carried out

Privacy by design is adopted for all new or changed systems and processes.

Lodging a complaint

Chelmer Footcare only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint to the Data Protection Compliance Officer.

Changes to our privacy notice

Chelmer Footcare may change this notice from time to time. All changes will be posted and updated here. We will notify clients directly by email (if we hold one for you and have consent) if any significant changes occur. We advise you to check back here frequently to review the most current version of this notice.

This Statement was last updated on 22nd May 2018